

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	
LITIGATION)	
_____)	MDL No. 2419
)	Dkt. No 1:13-md-2419 (FDS)
THIS DOCUMENT RELATES TO:)	
)	
All Actions)	
_____)	

**SAINT THOMAS ENTITIES’ MOTION FOR ENTRY OF A
SECOND AMENDED PROTECTIVE ORDER**

The Defendants Saint Thomas West Hospital, formerly known as St. Thomas Hospital, Saint Thomas Network, and Saint Thomas Health (collectively referred to as the “Saint Thomas Entities”) request that the Court enter their proposed Second Amended Protective Order that is attached to this Motion as Exhibit 1. Although the current *Amended Stipulated Protective Order of Confidentiality* (Docket #397) (Aug. 16, 2013) (“Protective Order”), was entered by the Court as a “stipulated” order, the Saint Thomas Entities had no input into that confidentiality compact, as they did not become parties to the MDL until after that time. The proposed changes are necessary to provide clarification of the obligations under the order and protection for these Defendants. For these reasons and those more fully set forth in their *Memorandum in Support of Motion to Stay Discovery Pending Submission of a Discovery Plan and Amended Protective Order and Motion for Second Amended Protective Order*, filed contemporaneously, the Saint Thomas Entities request that the Court: (i) enter a Second Amended Protective Order along the lines of the Saint Thomas Entities’ attached proposal (Exhibit 1); and (ii) grant such other and further relief to which the Saint Thomas Entities are entitled.

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS NETWORK,
AND SAINT THOMAS HEALTH

By its attorneys,

/s/ Sarah P. Kelly

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Dated: November 25, 2013

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rules 7.1(a)(2) and 16.1(b) & (d), I certify that the Saint Thomas Entities had multiple conferences with counsel for the PSC and for their Tennessee co-defendants on the dates and times detailed in the Declaration of Marcy Hogan Greer, filed contemporaneously, but the parties were unable to come to agreement as to the matters presented by this motion.

/s/ Sarah Kelly

Sarah P. Kelly

CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served on all parties of record by virtue of the Court's electronic filing system this 25th day of November, 2013.

/s/ Sarah Kelly

Sarah P. Kelly